

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-62034-CIV-DIMITROULEAS**

CHANEL, INC.,

Plaintiff,

vs.

A ACCESSORY STORE, *et al.*,

Defendants.

**PLAINTIFF’S NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES
AND ADDITIONAL PAYPAL ACCOUNT USED BY DEFENDANT NUMBER 68**

Plaintiff, Chanel, Inc. (“Plaintiff” or “Chanel”), by and through its undersigned counsel, hereby gives notice to the Court of its identification of additional aliases and Additional PayPal account used by Defendant Number 68 - vanco.ru (“Defendant”) as identified on Schedule “A” hereto, to receive money in connection with Defendant’s Additional Subject Domain Names, also identified on Schedule “A” hereto, and states as follows:

1. On September 30, 2021, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”) [DE 6].¹ On the same day, the Court granted Plaintiff’s Application for Temporary Restraining Order and entered a Sealed Temporary Restraining Order (the “Temporary Restraining Order”) [DE 10], and subsequently converted the Temporary Restraining Order into a Preliminary Injunction on October 29, 2021 (the “Preliminary Injunction”) [DE 28].

¹ Plaintiff hereby incorporates by reference its Application for Temporary Restraining Order, together with supporting declarations and exhibits [DE 6].

2. In the Court's Preliminary Injunction, the Court ordered, *inter alia*, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to Alibaba.com Hong Kong Limited, which operates the AliExpress.com platform ("AliExpress"), Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. ("Ant Financial Services"), AliPay (China) Internet Technology Co. Ltd., Alipay.com Co., Ltd., and Alipay Singapore E-Commerce Private Limited (collectively, "Alipay"), Amazon Payments, Inc. ("Amazon"), PayPal, Inc. ("PayPal"), Etsy, Inc. ("Etsy"), Stripe, Inc. ("Stripe"), ContextLogic, Inc., which operates the Wish.com website ("ContextLogic"), Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc, and their related companies and affiliates shall:

identify all funds in all financial accounts and/or sub-accounts associated with... the Seller IDs and Subject Domain Names, store numbers, merchant identification numbers, infringing product numbers, and/or the e-mail addresses identified on Schedule "A" hereto, as well as any other accounts of the same customer(s)... accounts which transfer funds into the same financial institution account(s) or any of the other financial institution accounts subject to this Order; restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit ... and any other accounts tied thereto...

See Preliminary Injunction at pp. 13-14, Para. 9 [DE 28].

3. After the Court's entry of the Preliminary Injunction, Plaintiff discovered Defendant is using the PayPal account identified on Schedule "A" hereto (the "Additional PayPal Account"), to receive money in connection with the sale of Plaintiff's branded goods through its newly discovered alias Internet websites operating under the Additional Subject Domain Names. (See Schedule "A" hereto; see also Declaration of Eric Rosaler in Support of Plaintiff's Notice of Identification of Additional Aliases and PayPal Account Used By Defendant Number 68 and Composite Exhibit "1" attached thereto, filed herewith.)

4. Accordingly, pursuant to the Court's October 29, 2021 Preliminary Injunction [DE 28], Plaintiff has requested PayPal restrain all funds in Defendant's Additional PayPal Account.

DATED: November 19, 2021.

Respectfully submitted,
STEPHEN M. GAFFIGAN, P.A.

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SCHEDULE "A"
DEFENDANT BY NUMBER, ADDITIONAL SUBJECT DOMAIN NAMES,
AND ADDITIONAL PAYPAL ACCOUNT

Def. No.	Defendant / Additional Subject Domain Names	Additional PayPal Account	E-mail Address
68	frankbag.cn epurse.cn	pursev@hotmail.com	Purseaaa@Hotmail.Com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served this 19th day of November, 2021, upon Defendant 68 via e-mail by providing the address to Plaintiff's Website to Defendant 68 via the e-mail accounts at which Defendant 68 was served and via Plaintiff's Website by posting a true and accurate copy of the foregoing on the URL appearing at <http://servingnotice.com/cs3Lf/index.html>.

Stephen M. Gaffigan
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